



CERTIFICATION

April 1, 2021

Via Email to chambers_of_judge_wolson@paed.uscourts.gov

United States District Court
Eastern District of Pennsylvania
Honorable Joshua D. Wolson
601 Market Street
Room 3809
Philadelphia, PA 19106-1726

RE: Lisa Barbounis v. The Middle East Forum
No. 2:19-cv-05030-JDW

Dear Judge Wolson:

I write in connection with the Court's Order dated December 4, 2020.

This letter is to certify that Plaintiff has completed all requirements of the December 4, 2020 Order. The final requirement was that Plaintiff undergo six credits of continuing legal education focused on e-discovery. Plaintiff completed seven credits. The seventh credit hour was not focused on e-discovery. It was a course entitled What Every In-House Counsel Needs to Know to Avoid Discovery Related Sanctions.

I have attached the certificates of completion to this e-mail. As Ordered by the Court, none of these credits were used in connection with counsel's annual obligations.

Very Truly Yours,
DEREK SMITH LAW GROUP, PLLC

BY: /s/ Seth D. Carson
Seth D. Carson, Esquire

CC: